**Cc:** Seter, David[Seter.David@epa.gov]; Rodriguez, Dante[Rodriguez.Dante@epa.gov]
**To:** Susan Juetten[artemesiaacres@gmail.com]
**From:** Peggy Pauly
**Sent:** Thur 3/17/2016 1:50:25 AM
**Subject:** Re: Anaconda Yerington Mine Site - ATSDR Investigation

Both the tribe and our group (YCAG) requested the ATSDR's investigation. We also requested their re-involvement in 2010 after the plume was definitively identified. In 2006, ATSDR said, in their presentation to our group, there was no identified pathway of contamination migrating off the site and impacting our water, air or soil. We hoped they would come back since a pathway had been proven.

Sent from my iPad

On Mar 16, 2016, at 5:59 PM, Susan Juetten <artemesiaacres@gmail.com> wrote:

> Thank you David.
>
> I believe the 2006 ATSDR occurred because the Yerington Paiute tribe asked for it.
>
> Keeping our fingers crossed,
>
> Susan Juetten
> Great Basin Resource Watch
>
> On Wed, Mar 16, 2016 at 3:42 PM, Seter, David <Seter.David@epa.gov> wrote:
>
> > Hi Susan, Peggy,
> > My colleague Dante Rodriguez told me he thinks ATSDR does a health assessment for sites placed on the NPL.
> > So if that's true, should Anaconda get placed on the NPL, then ATSDR would normally conduct a health assessment.
> > What that involves I'm not exactly sure but if we cross that bridge we will certainly be in touch with the community and stakeholders with those details.
> > As of now we are still awaiting a decision on NPL listing.
> > I hope that helps.
> > All best,
> > Dave Seter
> >
> > ---
> > From: Susan Juetten [artemesiaacres@gmail.com]
> > Sent: Tuesday, March 8, 2016 2:49 PM
> > To: Seter, David
> > Cc: Peggy Pauly
> > Subject: Re: Anaconda Yerington Mine Site - ATSDR Investigation

Hello David,

Peggy Pauly and I were wondering; we thought we heard you say there would be another ATSDR investigation around the Anaconda/Yerington mine site, but neither of us noted when that might be coming up; can you enlighten us?

Many thanks,

Susan Juetten
Great Basin Resource Watch

**********

On Thu, Feb 11, 2016 at 9:34 AM, Seter, David <Seter.David@epa.gov<mailto:Seter.David@epa.gov>> wrote:
[cid:image004.png@01D164AF.65CCCCB0]
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 11, 2016

Jack Oman
Project Manager
Atlantic Richfield Company
4 Centerpointe Drive
La Palma, CA 90623-1066

Re: Anaconda Yerington Mine Site OU1
Comments on Background Water Quality Assessment Revision 2

Dear Jack,

EPA has completed its review of the following document: Background Groundwater Quality Assessment, Revision 2, Yerington Mine Site, July 2, 2015. While EPA appreciates the data analysis presented in the report, we have performed a supplemental data analysis which leads to different conclusions in some areas. Therefore we believe further refinement is necessary. Determination of background levels is key to forthcoming project stages, such as alternatives development under the

Feasibility Study. EPA would like to see a further revision of this document. Please see the following introductory comments as well as the attached detailed comments. We would appreciate a response to comments. We are available for detailed discussion with the ARC team and technical stakeholder group on this topic.

Introductory comments:

* EPA applied additional constraints toward the selection of background wells as detailed in the following table:

ARC APPROACH

EPA COMMENTS / ADDITIONAL CONSTRAINTS

Spatial Location

Site-Specific Hydrogeology

Examine Datasets for Outliers

Examine Datasets for Temporal Trends / Stationarity

* EPA recommends excluding specific wells from the background data set. Specifically the following table identifies wells EPA found problematic, separated out by subarea:

BACKGROUNDWELL

DATASET

EPA COMMENTS

B/W – 12RB

SWRA

B/W – 13S

SWRA

B/W – 17B

SWRA

Outlier (based on uranium data trend)

B/W – 23B

SWRA

B/W – 26RB

SWRA

PLMW – 3RB

SWRA

PLMW – 4S

SWRA

Outlier (sulfur isotope value below range for natural recharge)

PLMW – 4B

SWRA

B/W – 15S

SERA

B/W – 20S

SERA

B/W – 21S

SERA

B/W – 39B

SERA

Outlier (sulfate and sulfur isotope concentrations similar to mine impacted wells)

PLMW – 2S

SERA

PLMW – 2B

SERA

WR3A – 1B

SERA

WRA3 – 2B

SERA

WR3A – 3B

SERA

Outlier (sulfur isotope value below range for natural recharge)

B/W – 56S

NSA

B/W – 59S

NSA

B/W – 59D3

NSA

* Excluding certain wells results in different (lower) proposed background levels for sulfate and uranium.

EPA recalculated the SWRA background levels (95/95 UTL) upon eliminating B/W-17B and PLMW-4S from the dataset as follows:

ARC VALUE

EPA VALUE

Sulfate (mg/l)

230

180

Arsenic (ug/l)

18

18

Uranium (ug/l)

76

27

EPA recalculated the SERA background levels (95/95 UTL) upon eliminating B/W-39B and WR3A-3B from the dataset as follows:

ARC VALUE

EPA VALUE

Sulfate (mg/l)

540

160

Arsenic (ug/l)

12

12

Uranium (ug/l)

35

21

* EPA's data analysis suggests delineation of the extent of mine impacted groundwater to the west of the mine property should be based on arsenic and that mine impact may extend as far west as location B/W-16.

* EPA's data analysis results in revision of Figure 7-1 Extent of Mine-Impacted Groundwater – Shallow Zone.

* EPA recommends carrying out the evaluation of extent of mine impacted groundwater for the alluvium (shallow zone through D5 zone inclusive) plus bedrock. The current analysis is limited to the alluvium at two depths, i.e. the shallow zone and D3 zone.

Detailed Comments
See attached comments dated 12/10/15 and 2/1/16.

Best Regards,
David A. Seter, P.E.
Remedial Project Manager
USEPA Region 9
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, CA 94105
415-972-3250<tel:415-972-3250>